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March 22, 2021

VIA ECF

Hon. Naomi Reice Buchwald
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl St., Courtroom 21A
New York, New York 10007

Re: *Feldman et al. v. Strulovitch et al.*, Case No. 20-cv-07270-NRB

Dear Judge Buchwald:

This firm represents the “Strulovitch Defendants”¹ in this action. Pursuant to Rule 1(E) of Your Honor’s Individual Practices, we are respectfully requesting an extension of the Strulovitch Defendants’ time to respond to Plaintiffs’ Second Amended Complaint [ECF No. 46].

The current deadline to respond to the Second Amended Complaint is March 31, 2021. We respectfully request that the deadline for the Strulovitch Defendants be extended up to and including April 30, 2021.

We make this request because the Strulovitch Defendants and Plaintiffs, along with parties in actions pending in the Eastern District of New York, New York Supreme Court and other forums, are in the late stages of negotiating an agreement that would govern a global arbitration. This has been a complicated undertaking in light of the number of claimants, respondents, actions (which include bankruptcy matters), and lawyers involved, but the parties have made significant progress on the negotiation of the global arbitration agreement. The parties are in the process of

¹ The Strulovitch Defendants are Yechezkel Strulovitch, CS Construction Group LLC, Glaubers Chasidisha Clothing LLC, Glaubers Clothing LLC, Glaubers Quality Clothing LLC, Glaubers Traditional Clothing LLC, 945 Park Pl LLC, 1078 Dekalb LLC, 74 Van Buren LLC, 454 Central Avenue LLC, 980 Atlantic Holdings LLC, Penn Condominium LLC, Throop Home, LLC, The Bushwick Partners LLC, Brooklyn Ventures LLC, The Howard Day House LLC, 741 Lexington LLC, CSY Holdings LLC, CAS Management Company, Bayshore, Inc., 31 Brooklyn LLC, 119 Holdings LLC, 1642 Equities LLC, Herman Greenfeld as trustee of Givas Olim Trust, Mendel Brach as trustee of Givas Olim Trust, Penn & Marcy LLC, 599-601 Willoughby, 908 Bergen Street LLC, 901 Bushwick Avenue LLC, Gates Equity Holdings LLC, 853 Lexington LLC, 348 St. Nicholas LLC, 762 Willoughby LLC, 855 Dekalb Avenue LLC, The Bridge Tower LLC, 619 Holdings LLC, Grand Suites LLC, Catalpa Development, LLC, Slope Offices LLC, 482-484 Seneca LLC, 1217 Bedford LLC, 1266 Pacific LLC, Myrtlino Holdings, LLC, 259 Berry LLC, 261 Berry LLC.



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finalizing the terms, and then will need to obtain the signatures of the many individuals (most of whom reside overseas) and entities that will be participating.

There have been no previous requests to extend the deadline to respond to the Second Amended Complaint, and this request does not impact any other deadlines set in this case.

Plaintiffs' counsel has advised that Plaintiffs consent to this request for an extension.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Meaghan Roe

Meaghan Roe

cc: Counsel of Record (via ECF)

Application granted.

SO ORDERED.

A handwritten signature in blue ink, reading 'Naomi Reice Buchwald'.

NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, N.Y.
March 23, 2021